

M/D 1

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA

William Aaron Rollins

Full name and prison name of
Plaintiff(s)

v.

Comm. R. Reed

Sgt. Kirsey

Sgt. Buchanan

C.O. Moon

In their individual and

official capacities

Name of person(s) who violated your
constitutional rights. (List the names
of all the person.)

2008 JAN 15 A 9:31

DEBRA P. HACKETT
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

CIVIL ACTION NO. 1:08CV33-mht
(To be supplied by Clerk of U.S. District
Court)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES ☐ No ☒
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES ☐ NO ☒
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) Non-applicable

Defendant(s) " "

2. Court (if federal court, name the district; if state court, name the county)

" "

3. Docket number Non-applicable
4. Name of judge to whom case was assigned " "
5. Disposition (for example: was the case dismissed? Was it appealed? Is it still pending?) " "
6. Approximate date of filing lawsuit " "
7. Approximate date of disposition " "

II. PLACE OF PRESENT CONFINEMENT Houston County Jail

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED Houston

County Jail - Dothan Alabama (901 E. Main St)

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS. 36301

| | NAME | ADDRESS |
|----|----------------------|------------------------------------|
| 1. | Commander Keith Reed | 901 E. Main Street (Dothan, AL) |
| 2. | Sgt. Kirsy | 901 E. Main St. (Dothan, AL 36301) |
| 3. | Sgt. Buchman | 901 E. Main St (Dothan, AL 36301) |
| 4. | C.O. Moon | 901 E. Main St. (Dothan, AL 36301) |
| 5. | Sgt. R. Turner | 901 E. Main St. (Dothan, AL 36301) |
| 6. | | |

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED Varied from the date 3-6-07 - 1-20-08 (numerous incidents on record)

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: 14th Amendment Equal Protection violation (particularized instances of retaliatory conduct directed against inmate Rollins.

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

Dating as far back as 2-27-07 until this date of 1-10-08 (I received another inmate sanction restriction on this date), Sgt Kersey has repeatedly imposed illegitimate animus toward me (intentional procedural discrimination by the Houston County Jail supervisory personnel).

GROUND TWO: 5th Amendment Due Process violations

Intentional deprivation of life, liberty and property in an unfair manner (including racial and status discrimination)

SUPPORTING FACTS: Circumstances can be verified of these events (particularly on the specific date of 10-11-07) pertaining to an incident showing arbitrary confiscation and improper segregated lock down being imposed by the named officials Sgt. Kersey, Sgt Buchman C.O. Moon, and Commander Reed without notice or Substantiation

GROUND THREE: Abusive and intentional manipulative conduct by the named defendants in their individual capacity (42 U.S.C.A and 8th Amend Cruel + Unusual Punishment)

SUPPORTING FACTS: Officers Kersey, Buchman, Reed and Turner in their supervisory positions violated inmate Rollins constitutional rights by using retaliatory based procedures on prior occasions (during the period Rollins has been incarcerated at the Houston County Jail) and treatment of Rollins shows intentionally different treatment from others similarly situated.

- VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Plaintiff is seeking an injunction and declaratory
relief pertaining to the improper conduct
which has occurred based on clearly
established law that recognizes (1) The Equal
protection claim and (2) Due Process claim based on
law enforcement policies, and practices that caused inmate
Rollins personal injury.

William Rollins
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 1-10-08
(Date)

William Rollins
Signature of plaintiff(s)

William Rollins #000644-62
901 E. Main St.
Dothan, AL 36301

"Legal Mail"
"Confidential"

Debra Hackett - District Court Clerk
United States District Court
P.O. Box 711
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